

By this Notice, Plaintiff Access Living informs the Court of the sad news that one of Plaintiff's experts in this matter, Judy Heumann, passed away on March 4, 2023. Plaintiff promptly informed Defendant of Ms. Heumann's passing on March 7, 2023. Plaintiff has begun the process to locate a replacement expert. Plaintiff will notify the Court as soon as Plaintiff has identified an expert and request a schedule for a replacement report. Plaintiff notes that expert discovery is currently ongoing, set to close on May 8, 2023. Ms. Heumann was to be an expert on damages only.

Respectfully Submitted,

/s/ Michael G. Allen
Michael G. Allen*
Jennifer I. Klar*
Valerie D. Comenencia Ortiz*
Emily E. E. Curran*
RELMAN COLFAX PLLC
1225 19th Street NW, Suite 600
Washington, DC 20036
Tel: 202-728-1888
Fax: 202-728-0848

mallen@relmanlaw.com
jklar@relmanlaw.com
vcomenenciaortiz@relmanlaw.com
ecurran@relmanlaw.com

Kenneth M. Walden
Mary Rosenberg
Access Living of Metropolitan Chicago
115 West Chicago Avenue
Chicago, IL 60654
Tel: 312-640-2136
Fax: 312-640-2101
TTY: 312-640-2102
kwalden@accessliving.org
mrosenberg@accessliving.org

Attorneys for Plaintiff

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2023, a true and correct copy of the foregoing Plaintiff's Notice of Death of Expert was served via CM-ECF on all attorneys of record.

/s/ Michael G. Allen
Michael G. Allen